

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, ex rel. )  
LOUIS LONGO, )

Plaintiff-Relator )

v. )

Case No. 2:17-cv-01654-MJH

WHEELING HOSPITAL, INC., )  
R&V ASSOCIATES, LTD., and )  
RONALD L. VIOLI )

Defendants. )

**DECLARATION OF DR. CHANDRA SWAMY**

I, Dr. Chandra Swamy, hereby declare as follows:

1. I am an adult over the age of eighteen (18) and a resident of the State of West Virginia.

2. The information contained in this Declaration is based on my personal knowledge.

If called to testify, I would state as follows:

3. I am an obstetrician-gynecologist. I joined Wheeling Hospital ("Hospital") in 2009. Prior to joining the Hospital, I had a private practice for approximately 28 years in Wheeling, West Virginia.

4. I typically work 12 hours per day and I normally see between 45-50 patients daily during a five day work-week.

5. My practice is exclusively at the Hospital, except for certain medical procedures that I periodically perform for patients at the St. Clairsville Health Center, located ten miles away from the Hospital in St. Clairsville, Ohio and I also used to perform certain medical procedures periodically at the Belmont Community Hospital, located seven miles from the Hospital in

Bellaire, Ohio prior to its closing on April 5, 2019.

6. If I were required to travel to Pittsburgh, Pennsylvania to testify or attend court proceeding in this case, it would be very disruptive to my practice because I am a sole practitioner and I would have to rely on other physician colleagues at the Hospital to cover my busy schedules while trying to care for their own patients. I am an established physician in the Wheeling community and my patients prefer to see me as opposed to another doctor.

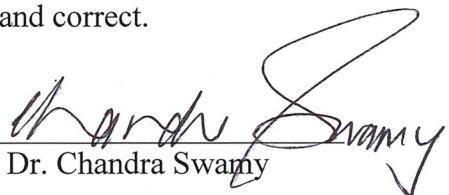
7. My ability to provide patient care could be negatively affected if I had to travel to Pittsburgh to testify in this case because my patient files and records are located at the Hospital and I have very limited access to them when I am away from my office.

8. It would be more convenient if the trial and other proceedings in this case were in Wheeling, West Virginia because the federal courthouse in Wheeling, located at 1125 Chapline Street, is less than four miles from the Hospital. This would lessen my travel-related lost work time and other hardships because I could see patients before and/or after my court appearances. In addition, if I had to testify or otherwise appear in court in Wheeling, I could quickly return to the Hospital in the event of an emergency.

9. If called to testify in this case, I would further testify regarding my contract (including compensation) negotiations with the Hospital, my medical practice and procedures, and the billing protocols used in my practice.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 9, 2019  
in Wheeling, West Virginia

  
Dr. Chandra Swamy